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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 MICHELLE CHADDERTON,

11 Plaintiff,

12 vs.

13 INTERMOUNTAIN HEALTHCARE, a Utah
14 Corporation; LORRAINE ROEUN, an
individual; and JUDITH BARNETT, an
individual,

15 Defendants.

16 CASE NO.: 2:24-cv-00192-APG-NJK

17 **STIPULATION AND [PROPOSED]
18 ORDER TO CONTINUE EARLY
19 NEUTRAL EVALUATION**

20 Defendant Intermountain Healthcare, (“Defendant”) individual Defendants Lorraine Roeun
21 and Judith Barnett (“Individual Defendants”), and Plaintiff Michelle Chadderton (“Plaintiff”), by
22 and through their respective undersigned counsel, hereby stipulate and jointly request the Early
Neutral Evaluation (“ENE”) currently set for July 18, 2024 be continued to a date after August 14,
2024 or during the weeks of August 19, 2024 and August 26, 2024, or as soon thereafter as the Court
can schedule the continued ENE.

23 Defendants’ lead counsel, Suzanne L. Martin will be out of the country, and will not be
24 returning to the office until July 24, 2024. Immediately thereafter, and through August 9, 2024,
25 Plaintiff will be traveling, as will counsel for the Individual Defendants, and as such they will not be
26 available.

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1 The parties recognize that conducting the ENE in August 2024 will result in the ENE to be
 2 within four to six weeks of the close of discovery, which is currently scheduled for September 30,
 3 2024. The parties therefore agree to work together in good faith to make a joint request to extend
 4 the time for discovery, either before or after the ENE, should they determine that additional time to
 5 complete discovery is necessary and appropriate.

6 This stipulation and joint request is being made in good faith, and not for purposes of causing
 7 any delays.

8 DATED this 20th day of June, 2024.

9 DATED this 20th day of June, 2024.

10 LAW OFFICES OF MICHAEL P. BALABAN

11 OGLETREE, DEAKINS, NASH, SMOAK & STEWART
 12 P.C.

13 */s/ Michael P. Balaban*

14 */s/ Kathryn C. Newman*

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27 *Attorney for Plaintiff,
 28 Michelle Chadderton*

29 *Attorneys for Defendant,
 30 Intermountain Healthcare*

31 DATED this 20th day of June, 2024.

32 MARTINEZ, DIETERICH & ZARCONE
 33 LEGAL GROUP

34 */s/ Jenny L. Foley*

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 36 Intermountain Healthcare*

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41 *Attorney for Defendants,
 42 Lorraine Roeun and Judith Barnett*

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ORDER

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IT IS SO ORDERED. The parties' stipulation is granted, but the Court does not
3 have availability in August 2024 per the parties' request. The ENE is rescheduled
4 to September 19, 2024. The rest of the Court's previous order (ECF No. 9)
5 remains in full effect.

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UNITED STATES MAGISTRATE JUDGE

6-25-24

DATE